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August 12, 2008  
File No.: 04.02.06.02  
Project No. 357891

Mr. Che McFarlin, Project Manager  
California Energy Commission  
Systems Assessment and Facilities Siting Division  
1516 9th Street, MS 15  
Sacramento, CA 95814-5504

<b>DOCKET</b>	
<b>07-AFC-5</b>	
<b>DATE</b>	<b>AUG 12 2008</b>
<b>RECD.</b>	<b>AUG 12 2008</b>

RE: Supplemental Data Response, Set 1A  
Ivanpah Solar Electric Generating System (07-AFC-5)

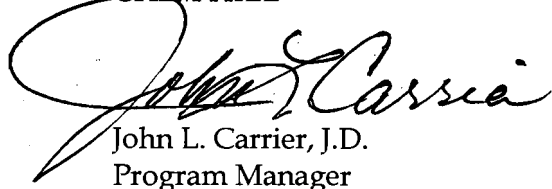
Dear Mr. McFarlin:

On behalf of Solar Partners I, LLC, Solar Partners II, LLC, Solar Partners IV, LLC, and Solar Partners VIII, LLC, please find attached one original and 12 hard copies of the Supplemental Data Response, Set 1A, which provides supplemental responses to Staff's questions raised at the June 23, 2008 Workshop in Primm, Nevada.

Please call me if you have any questions.

Sincerely,

CH2M HILL

  
John L. Carrier, J.D.  
Program Manager

Enclosure

c: POS List  
Project File

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# **Ivanpah Solar Electric Generating System (ISEGS)**

**(07-AFC-5)**

## **Supplemental Data Response, Set 1A**

**(Responses to: Air Quality, Biological Resources, Cultural  
Resources, Socioeconomics, Soil & Water, and Traffic &  
Transportation)**

Submitted to the  
**California Energy Commission**

Submitted by  
**Solar Partners I, LLC; Solar Partners II, LLC; Solar Partners IV, LLC;  
and Solar Partners VIII, LLC**

August 12, 2008

With Assistance from

**CH2MHILL**

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Sacramento, CA 95833

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# Introduction

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Attached are supplemental responses (Set 1A) by Solar Partners I, LLC; Solar Partners II, LLC; Solar Partners IV, LLC; and Solar Partners VIII, LLC (Applicant) to the California Energy Commission (CEC) Staff's data requests for the Ivanpah Solar Electric Generating System (Ivanpah SEGS) Project (07-AFC-5). These data requests are the result of the workshop discussion held at Primm, Nevada on June 23, 2008. Within each discipline area, the responses are presented in alphabetical order and are numbered for tracking and reference convenience. New graphics or tables are numbered in reference to the Supplemental Data Request number. For example, if a table were used in response to Data Request AQ-1, it would be numbered Table AQ1-1. The first figure used in response to Data Request AQ-1 would be Figure AQ1-1, and so on. AFC figures or tables that have been revised have "R1" following the original number, indicating revision 1.

Additional tables, figures, or documents submitted in response to a supplemental data request (supporting data, stand-alone documents such as plans, folding graphics, etc.) are found at the end of a discipline-specific section and may not be sequentially page-numbered consistently with the remainder of the document, though they may have their own internal page numbering system.

The Applicant looks forward to working cooperatively with the CEC and Bureau of Land Management (BLM) staff as the Ivanpah SEGS Project proceeds through the siting process. We trust that these responses address the Staff's questions and remain available to have any additional dialogue the Staff may require.

# Air Quality (AQ-1)

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## Data Requests

AQ-1. Please provide a copy of the South Coast Air Quality Management District (SCAQMD) construction mitigation guidelines that would apply to the Ivanpah SEGS project.

**Response:** A copy of the CEQA Air Quality Handbook (April 1993) prepared by SCAQMD is provided as Attachment AQ1-1. However, because of its size (578 pages) 5 hard copies are being provided to the CEC and to BLM. An electronic (CD-ROM) copy will be provided to the parties upon request. Also, copies of this handbook can be obtained by contacting SCAQMD's Subscription Services at (909) 396-3720.

# Biological Resources (BR-1)

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BR-1 The AFC did not contain any information on the Gila monster. However, there is some data that indicates that Gila monsters may be found in the project area. Please provide an analysis of the project's effects on the Gila monster.

**Response:** The Gila monster subspecies, the banded Gila monster (*Heloderma suspectum cinctum*), is considered rare in California relative to the distribution of *Heloderma suspectum* in the southwestern deserts, particularly western Arizona. According to Lovich and Beaman (2007) there are only 26 credible records of the species in California within the past 153 years. Lovich and Beaman (2007) conclude that the distribution in California may be restricted to appropriate habitat that receives adequate summer rain. In California, the Gila monster is considered a Species of Special Concern by the California Department of Fish and Game (CDFG) and a Sensitive species by the Bureau of Land Management and the Forest Service.

Most of the historical observations in California occurred in mountainous areas of moderate elevations with rocky, incised topography, in large and relatively high ranges as well as riparian areas (Lovich and Beaman 2007). Despite the widespread localities of potential habitat throughout the Mojave Desert, the few documented observations suggest the California populations appear to be confined to the eastern portion of the state (Lovich and Beaman 2007). As of 1982, of the seven documented Gila monster observations in California, six were from eastern San Bernardino County (Brown and Carmony 1991). Based on more recent investigation by Lovich and Beaman (2007), all 26 credible records of California Gila monster observations occurred east of the 116° longitude<sup>1</sup> in areas that received at least 25 percent of their annual precipitation during the summer months. This would be consistent with the reptile's biogeographic affinity with the Sonoran Desert, which is characterized by a distinct and biotically important summer rainy season. In turn, throughout their range, the Gila monster appears to be most active during or following summer rain events.

Evidently, this large and distinct lizard is difficult to observe even in areas where they have been recently recorded or are considered abundant. Gila monsters are less heat tolerant and more sensitive to maintaining a healthy water balance relative to other desert reptiles within its distribution (Brown and Carmony 1991). In response, Gila monsters spend a great deal of time in their winter hibernacula and summer shelters. Observing and tracking daily activity of this elusive animal is difficult to do without the aid of radio telemetry. According to two separate telemetry study, Gila monsters spend less than 5 percent of their time active and aboveground and are only active for brief intervals during their peak activity periods (Brown and Carmony 1991). As a result, very little is known about this enigmatic species' distribution, population status, and life history in California.

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<sup>1</sup> The project area lies at about 115°30', or about 25 miles east of that boundary and therefore within this range limit.

Gila monsters have been recorded near the proposed Ivanpah SEGS project area in the adjacent Mojave National Preserve and the Clark Mountains (Lovich and Beaman 2007). The closest observation of a Gila monster to the project area is likely an animal collected within the Mojave National Preserve 46 years ago in 1962 on the eastern slope of the Clark Mountains near Ivanpah Springs (Persons and Nowack. 2007). Although a verified observation of a Gila monster has yet to be recorded in the Ivanpah Valley, the species presence has been assumed and Gila monster-specific minimization measures have been prescribed for other recent proposed projects within the Valley (BLM Document # NV-050-2006-389 and NV-053-2006-472). The Nevada Department of Wildlife (NDOW) also identified the Ivanpah Valley as Gila monster habitat in response to the Draft Environmental Impact Statement (EIS) for the Ivanpah Energy Center (Parsons 2003). Jeff Lovich of the USGS believes there is a potential for the species to occur in the rockier areas of Ivanpah Valley and is aware of an incidental observation of a Gila monster tail found under a red-tail hawk nest near Primm, Nevada (personal communication, July 21, 2008).

Like most areas of the desert, rainfall within the Ivanpah Valley is variable with mean annual precipitation of approximately 4 to 7 inches. The distribution of rainfall is also bi-modal with winter peak precipitation typically in December through February and summer peak rain falls in July through September, the latter essentially being the northwestern-most extension of the summer monsoons of the Sonoran Desert. Runoff from the steep surrounding mountains is rapid and flash floods are common events as most of the stormwater in the Ivanpah Valley drains across the bajadas to Ivanpah and Roach dry lakes. Although the Mojave is the driest of the North American deserts, the east Mojave receives a large percentage of its annual precipitation from summer "monsoon" rains. As reported in Hereford et. al (2003) the relative abundance of cacti, many yuccas, agaves, and agave-like plants tend to be greater where warm-season rainfall is abundant. This is true of the Ivanpah SEGS project area where cacti are abundant relative to many other parts of the Mojave Desert. Although the project area does not receive nearly the amount of the winter and summer rainfall as the Sonoran Desert, where Gila monsters are more prevalent, with 35 to 40 percent of its average annual increment falling as summer precipitation<sup>2</sup>, the precipitation seasonality of the Ivanpah Valley would be consistent with the presence of the Gila monster.

Gila monsters have the potential to occur in the Ivanpah SEGS project area, particularly near the Metamorphic Hill, immediately adjacent to the southeastern boundary of Ivanpah 3 and the northeastern corner of Ivanpah 2 as well as the Limestone Ridge to the west of Ivanpah 3, and within the gas line interconnection south of the base of the Clark Mountains and immediately north of Ivanpah 3. Gila monsters may also venture from those rockier areas adjacent to the project area where they would likely take refuge in small crevices, caves, and underground burrows to forage within the numerous rocky habitats provided by the arroyos in the project area. Because the presence of this species cannot be ruled out, the Nevada Department of Wildlife's (NDOW) "Gila Monster Protocol for Minimizing Impacts

<sup>2</sup> Based on multidecadal measurements from Mountain Pass in the Clark Mountains, about 6 miles to the southwest of Ivanpah SEGS.

on Construction Sites" (provided as Attachment BR1-1) would be implemented to avoid potential adverse effects to Gila monsters, should they occur, associated with construction of the Ivanpah SEGS.

### References

- Brown, D. E. and N. B. Carmony. 1991. Gila Monster, Facts and Folklore of America's Aztec Lizard. High-Lonesome Books. Silver City, New Mexico.
- Lovich, J. E. and K. R. Beaman. 2007. A History of Gila Monster (*Heloderma suspectum cinctum*) Records from California with Comments on Factors Affecting their Distribution. Bull. Southern California Acad. Sci. 106(2): 39-58.
- Parsons. 2003. Ivanpah Energy Center Final Environmental Impact Statement. Prepared for the Bureau of Land Management and Western Area Power Administration. May 2003. Available at <http://www.eh.doe.gov/NEPA/eis/eis0354/tocindex.html>.
- Persons, T. B. and Nowak, E. M. 2007. Inventory of amphibians and reptiles at Mojave National Preserve: U.S. Geological Survey Open-File Report 2007-1109 [<http://pubs.usgs.gov/of/2007/1109/>].
- Hereford, R., R. H. Webb, and C. I. Longpre. 2003. Precipitation History of the Mojave Desert Region, 1893-2001. Available at: <http://pubs.usgs.gov/fs/fs117-03/>



**INSERT ATTACHMENT BR1-1**

# Cultural Resources (CR-1)

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## Data Requests

CR-1. Please provide what information is available to the applicant about the improvements (and alternatives) SCE is considering for the substation and transmission-lines adjacent to the project site.

**Response:** The proposed Ivanpah substation will be located between Ivanpah 1 and Ivanpah 2 in parallel with and to the northwest of the existing transmission lines. There are three existing transmission lines in parallel running from the southwest to the northeast: Los Angeles Department of Water and Power's (LADWP) 500 kV steel lattice tower line (southernmost), Southern California Edison's (SCE) 115 kV line on steel H-beam towers (in the middle), and an SCE 33 kV line on wood poles (northernmost). The preferred substation site is the southwestern site, and the alternate site is immediately to the northeast. (See DR 130-2, Set 2A [Drawing IVAN-1-DW-024-112-002]).

SCE's plans for the 115 kV transmission line call for removal of the existing 115 kV line and its towers between the Mountain Pass and El Dorado substations. The portion of the line to the northeast of the Ivanpah substation will be replaced with one new 230 kV double-circuit tower line. The portion of the line southwest of the Ivanpah substation will be replaced with two 115 kV double-circuit pole lines. The 115 kV generation tie (gen-tie) line from Ivanpah 1 will enter the substation from the southwest and the gen-tie lines from Ivanpah 2 and Ivanpah 3 will enter the substation from the northwest to interconnect into the Ivanpah 115 kV switchyard located at the southern end of the substation.

The following discussion assumes the southern site is used for the substation, but the approach would be nearly identical for the northern alternative, only the substation coordinates would change. The substation area is proposed to be 885 feet by 850 feet, with additional 400 feet by 885 feet for SCE easements required at both the southwest and northeast ends to accommodate the turning of the lines into the substation. The southeastern substation fence would be located between 40 and 50 feet to the northwest of the existing 33 kV line. The LADWP 500 kV transmission line will be undisturbed by the project. A new 230 kV line to the northeast would replace the existing 115 kV transmission line between the proposed Ivanpah and the El Dorado substations and would use steel lattice towers approximately 120 to 160 feet tall. The new 230 kV lines would cross the 33 kV line approximately 400 feet northeast of the Ivanpah substation and angle into the 230 kV switchyard located at the northern end. The line will turn into the switchyard on two lattice towers designed for increased tension within the 400-foot by 885-foot easement to the northeast of the substation proper. At the southern end of the substation, two transmission lines (four 115 kV circuits) on two sets of steel poles approximately 85 feet tall will leave the Ivanpah substation, cross the 33 kV distribution line to the

southwest of the substation, and continue within the existing SCE right-of-way to the Mountain Pass substation and other locations not yet determined. One of these two transmission lines will replace the existing 115 kV single-circuit line between the Ivanpah and Mountain Pass substations. The other line will connect to future generation projects. The existing 115 kV line will remain unchanged southwest of the Mountain Pass Substation. Also, at the southern end of the substation, the 115 kV single circuit gen-tie line from Ivanpah 1 composed of approximately 70-foot-tall steel poles will cross under the existing 500 kV line near a tower then cross through the SCE right-of-way and over the 33 kV distribution line just to the southwest of the substation. A steel pole with increased tensile strength will angle the circuit into a breaker bay in the southern 115 kV switchyard of the substation. The gen-tie lines from Ivanpah 2 and Ivanpah 3 will interconnect into bays in the 115 kV switchyard from a double-circuit transmission line composed of steel poles approximately 85 feet tall approaching the substation from the north. An approximately 400-foot easement at the southern end of the substation will need to be acquired to route these 7 circuits on 6 angle structures into the 115 kV switchyard of the substation.

The configuration of the proposed Ivanpah substation shown in AFC Figure 3.1-1 of is still the anticipated layout except for the decrease in the overall size of the substation proper indicated in the above discussion.

# Socioeconomics (Socio-1)

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## Data Request

Socio-1. Confirm whether or not the project will pay property taxes to San Bernardino County.

**Response:** Because the project is located on federal land, it is expected to pay possessory interest taxes to San Bernardino County on the lease and property taxes on the improvements. Initially, the California Board of Equalization (BOE) was going to assess the tax value since the project comes under its jurisdiction. The BOE generally assesses property taxes on energy generating facilities of 50MWs or larger.

However, the BOE is currently in the process of revising this policy, especially with respect to renewable energy power generating facilities. The BOE is considering letting local entities (i.e., County Assessor's offices) assess the property values on these facilities. Part of what is driving this policy change is an interpretation of the California Public Utilities Code (PUC) Section 218. Section 218 provides a definition of what is considered an "electrical corporation" for purposes of assessing some aspects of property value (Johnson, 2008). According to Section 218, Ivanpah SEGS would not be considered an electric generating facility/electrical corporation for purposes of assessing some aspects of property value since: (1) it would generate electricity from renewable sources, and (2) it has a contract to sell the generated electricity to another electrical generating corporation (Pacific Gas & Electric Company). Thus, since Ivanpah SEGS is not an electrical generating corporation, it would be the County Assessor's Office and not the BOE that would assess the project's property value.

In addition to Section 218, the BOE will also be applying the exclusion provided to new construction of solar energy generating facilities per the Revenue and Taxation Code, Section 73. Under this exclusion, the solar field (including power towers and heliostats) will not be included in any assessed property value for purposes of determining property taxes (Thompson, 2008). Heliostats would only be assessed property taxes if they are sold by Ivanpah SEGS.

The BOE is also evaluating its policy to enable it to assess a possessory interest tax on the land Ivanpah SEGS is leasing from the BLM (Johnson, 2008). This would be on the land and all other improvements with the exception of the heliostats and power towers.

However, as of mid-July 2008, the BOE had yet to finalize any of the proposed policy changes. Once the policy changes are finalized, the BOE intends to communicate it to the public and the county assessor's offices.

# Soil & Water (S&W-1 through S&W-4)

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## Data Requests

S&W-1. Please provide the parameters for armoring the retention ponds.

**Response:** The decision as to what degree of erosion protection is to be provided will depend upon the amount of erosion expected and the damage that might result from the anticipated erosion. Armoring of the retention ponds will be provided at the pond inlets (ephemeral stream entrances) and outlets (pond weirs and piped outfalls) consisting of native stone rip-rap (where available) with a geo-textile underlay. Where maximum velocities are determined to be excessive, concrete will be used for armoring.

S&W-2. Please provide water velocities and the assumptions that go into determining the velocity.

**Response:** Each site's maximum water velocities are to be calculated using the flow rates developed through each sub-basins hydrological analysis for the 100-year 24-hour storm event. The Manning's equation and the Continuity equation will be used (where appropriate) in calculating velocities. It is assumed that the cross sectional areas of each ephemeral wash will be trapezoidal with 3 H to 1 V sloping sides.

S&W-3. Please provide an outline of what the 90 percent design drawings will include.

**Response:** The work described in the Plan of Development Civil Engineering Design Package, which was submitted with the rest of the CEC data request response, will be used to produce the 90 percent Civil Engineering design package that will have sufficient detail for permitting and for soliciting bids from EPC contractors. This package for Ivanpah 1, 2 and 3 is to consist, at a minimum, of 66 new drawings and detailed engineering calculations as follows:

### Drawings

- 3 - Overall Site Layout Plans (1:400 scale or better) providing a better overall view of the site layout.
- 15 - Site Grading Plans (1:60 scale) to layout the site earth designs for grading, leveling and vegetation removal.
- 15 - Drainage plans (1:60 scale) to provide specific site stormwater pond, diversion ditches, and culvert layouts.

- 15 - Erosion and Sedimentation Control Plans (1:60 scale) providing site drainage and erosion design in accordance with the latest Best Management Practices (BMPs) to meet the governing codes and standards.
- 4 - Site Road Surfacing Plans (1:200 scale) to layout the sites dirt, gravel and paved roadways (with shoulders) with dimensions and radii.
- 14 - Additional drawings to supplement the above mentioned plans with additional sections, details and notes needed to provide additional clarity.

### Calculations

- **Cut and Fill**

- Construction parking areas
- Power blocks
- Receiver towers
- Administration building area
- Heliostat fields (leveling areas)
- Switchyard

- **Site Hydrology**

- Site run-on calculations from adjacent western land for each sub-drainage area.
- Pre and post construction run off calculations for Ivanpah 1, 2 and 3.
- Pre and post construction run on and run off calculations for each facility sub-area (used to size each detention pond).

- **Site Hydraulics**

- Calculations to size major diversion berms.
- Calculations to size diversion channels around power blocks.
- Calculations to size diversion channels around and through heliostat fields.
- Calculations to size each detention pond.
- Calculations to size pond overflow structures (weir, orifice, flume, etc.).
- Calculations to size roadway culverts to power block areas.

- **Erosion and Sediment Control**

- Calculations to size Rip Rap for: detention pond overflows, relocated stream bed armoring, diversion channel and power block bank stabilization.
- Calculations to predict project soil erosion and depositions estimates.

- **Miscellaneous**

- Calculations to size the soil stacking areas.
- Calculations to size the spoil stacking areas

This 90 Percent Civil Engineering Design work is scheduled to be completed in September 2008.

**S&W-4:** Will treated wastewater from the package treatment plant be discharged aboveground or below ground to water landscape?

**Response:** Treated wastewater from the package sewage treatment unit will be collected into a small water tank from which a pump will distribute the water through the landscape irrigation system, aboveground.

# Traffic & Transportation (TT-1)

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## Data Requests

TT-1. What is the status of the FAA Form 7460-1?

**Response:** On May 20, 2008, Applicant filed Form 7460-1 ("Notice of Proposed Construction or Alteration") with the FAA for the single tower for Ivanpah 1 (Power Tower 1), the single tower for Ivanpah 2 (Power Tower 2), and the five towers of Ivanpah 3 (Power Towers 3-7). As discussed below, the Applicant has received FAA responses for 6 of the 7 towers.

First, the FAA is still processing the Form 7460-1 for Power Tower 1, the single tower for Ivanpah 1; however, Applicant is informed and believes that Power Tower 1 will receive a "Determination of No Hazard to Navigation". Applicant will forward this determination as soon as it is received.

Second, on July 23, 2008, the single tower for Ivanpah 2, Power Tower 2, received a "Determination of No Hazard to Navigation" from the FAA.

Third, on July 23, 2008, 4 of the 5 towers associated Ivanpah 3 (Power Towers 3, 4, 5, and 6) received a "Determination of No Hazard To Navigation" from the FAA.

Each Determination of No Hazard to Air Navigation discussed above also specified that the towers needed to be marked and/or lighted in accordance with FAA Advisory circular 70/7460-1 K Change 2, Obstruction Marking and Lighting, a med-dual system – Chapters 4,8 (M-Dual), & 12.

Finally, as expected, the fifth tower associated with Ivanpah 3 (Power Tower 7), the northwest most tower, received a "Notice of Presumed Hazard" (also dated on July 23, 2008) because the tower as proposed penetrated the 40 to 1 departure surface obstruction standard for the runways at the proposed Southern Nevada Airport (Ivanpah) planned between Primm and Jean, Nevada, by approximately 22 feet. The presumption of hazard because of the penetration of the 40 to 1 departure surface is based upon a standardized, non-project specific formula; however, this finding does not take into account project-specific nearby terrain (e.g., Clark Mountain) or airport specific planned departure procedures. Therefore, in order to receive a project-specific determination, the Applicant has requested that the FAA initiate an Extended Study for Notice of Presumed Hazard (NPH) 2008-AWP-3215-OE (the "Extended Study"). Applicant requested that the Extended Study include, among other things, considerations of existing terrain impact on proposed departures and planned departure procedures for the proposed Southern Nevada Airport. Applicant's analysis indicates that penetration of the 40:1 departure surface obstruction standard would not constitute an "adverse impact" on future operation of the proposed Southern Nevada Airport. The FAA posted Public Notice of the



Extended Study on July 29, 2008 and comments are due by September 4, 2008. We expect the FAA reply in mid to late September.

In the alternative, if the results of the Extended Study contradict the Applicant's findings, Applicant is prepared to lower the tower height of Power Tower 7 by 22 feet to avoid encroachment into the 40 to 1 departure surface. The Applicant would not move the tower. That lowering of Power Tower 7 in the same location would be expected to have a very slight beneficial effect on the visual impact of Ivanpah SEGS (i.e., the lessening of an already less than significant potential impact).

**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE  
STATE OF CALIFORNIA**

**APPLICATION FOR CERTIFICATION  
FOR THE IVANPAH SOLAR ELECTRIC  
GENERATING SYSTEM**

**DOCKET No. 07-AFC-5**

**PROOF OF SERVICE  
(Revised 7/14/08)**

**INSTRUCTIONS:** All parties shall 1) send an original signed document plus 12 copies OR 2) mail one original signed copy AND e-mail the document to the web address below, AND 3) all parties shall also send a printed OR electronic copy of the documents that shall include a proof of service declaration to each of the individuals on the proof of service:

CALIFORNIA ENERGY COMMISSION  
Attn: Docket No. 07-AFC-5  
1516 Ninth Street, MS-14  
Sacramento, CA 95814-5512  
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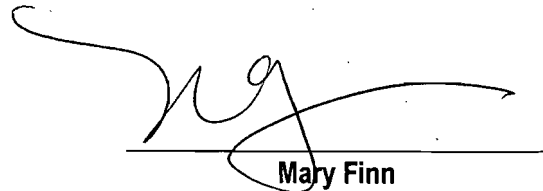
**pao@energy.state.ca.us**

**DECLARATION OF SERVICE**

I, Mary Finn, declare that on August 12, 2008 I deposited copies of the attached Supplemental Data Response, Set 1A in the United States mail at Sacramento, California with first-class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above.

Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, 1210. All electronic pages were sent to all those identified on the Proof of Service list above.

I declare under penalty of perjury that the foregoing is true and correct.

  
\_\_\_\_\_  
**Mary Finn**